

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Consolidated Civil Action**

RALEIGH WAKE CITIZENS
ASSOCIATION, et al.

Plaintiffs,

v.

WAKE COUNTY BOARD
OF ELECTIONS,

Defendant.

No. 5:15-cv-156

CALLA WRIGHT, et al.,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA,
et al.,

Defendants.

No. 5:13-cv-607

MOTION FOR ATTORNEY FEES, EXPERT FEES, AND LITIGATION EXPENSES

All Plaintiffs in this consolidated action, pursuant to 42 U.S.C. § 1988, 52 U.S.C. § 10310(e), and Fed. R. Civ. P. 54, respectfully request that the Court approve Plaintiffs' request for \$681,373.95 in attorney fees, \$32,813.42 in expert fees, and \$14,960.24 in non-taxable litigation expenses.

In support of this Motion, Plaintiffs rely on the Memorandum in Support of Motion for Attorney Fees, Expert Fees, and Litigation Expenses filed herewith; the attached Declarations of Michael Crowell, Anita S. Earls, J. Gerald Hebert, Allison J. Riggs, and Edwin M. Speas; the

July 1, 2016 Opinion of the United States Court of Appeals for the Fourth Circuit, No. 16-1270, Doc No. 51; and this Court's Order of August 9, 2016, No. 5:15-cv-156, ECF No. 104. These materials demonstrate that Plaintiffs are prevailing parties in this consolidated action, that Plaintiffs are entitled to recovery of reasonable attorney's fees, expert fees, and litigation expenses, and that the fee and expense award Plaintiffs request is reasonable.

Plaintiffs respectfully request that this Court grant their Motion and further order such relief as the Court deems appropriate.

Respectfully submitted this 23rd day of November, 2016.

/s/ Anita S. Earls

Anita S. Earls

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

This is to certify that the undersigned has on this day electronically filed the foregoing **Motion for Attorney Fees, Expert Fees, and Litigation Expenses** in the above-titled action with the Clerk of the Court using the CM/ECF system, which on the same date sent notification of the filing to the following:

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This the 23rd day of November, 2016.

/s/ Anita S. Earls
Anita S. Earls

Counsel for Plaintiffs